

# UNITED STATES DISTRICT COURT

for the  
District of Massachusetts

In the Matter of the Search of  
(Briefly describe the property to be searched  
or identify the person by name and address)

Safe Deposit Box numbered 735 and located at Santander  
Bank, 148 Everett Avenue, Chelsea, MA 02150

Case No. 19-mj-4200-DHH

## APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (identify the person or describe the property to be searched and give its location):

Safe Deposit Box numbered 735 and located at Santander Bank, 148 Everett Avenue, Chelsea, MA 02150

located in the \_\_\_\_\_ District of \_\_\_\_\_ Massachusetts \_\_\_\_\_, there is now concealed (identify the person or describe the property to be seized):

See Attachment

The basis for the search under Fed. R. Crim. P. 41(c) is (check one or more):

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

Code Section	Offense Description
21 U.S.C. § 846	Conspiracy to commit drug trafficking
18 U.S.C. § 894	Collection of extensions of credit by extortionate means

The application is based on these facts:

See Attached Affidavit of FBI Special Agent Tyler Delorme

- ☒ Continued on the attached sheet.
- ☐ Delayed notice of \_\_\_\_\_ days (give exact ending date if more than 30 days: \_\_\_\_\_) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

  
Applicant's signature

Tyler Delorme, Special Agent, FBI  
Printed name and title

Sworn to before me and signed in my presence.

Date: 03/19/2019

City and state: Boston, Massachusetts

  
Judge's signature  
Hon. David H. Hennessy, United States Magistrate Judge  
Printed name and title



**ATTACHMENT**

**ITEMS TO BE SEIZED**

I. All records, in whatever form, and tangible objects that constitute evidence, fruits, or instrumentalities of violations of 21 U.S.C. § 846 and 18 U.S.C. § 894 , including:

A. Cash and currency, and other items of value made or derived from trafficking in illegal substances or documents related thereto, including information about the location of warehouses or other places where narcotics may be stored. Such items include, but are not limited to jewelry, precious metals, titles, deeds, monetary notes, registrations, purchase or sale invoices, bank records, or any other papers concerning financial transactions relating to the Target Offenses;

B. Documents evidencing the collection of debts, including ledgers, lists of names, amounts owed, gambling or betting figures, invoices and other paraphernalia used or acquired to facilitate the collection of debts or the distribution of narcotics;

C. Weapons of any kind, including knives and firearms.